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UNITED STATES DISTRICT COURT
DISTRICT OF CAROLINA (GREENVILLE) · 2013 APR 10 P 12:47

UNITED STATES OF AMERICA)	Case No. 6:13-cr-00170-CRI
Plaintiff,)	
)	
And)	
)	Motion for order release
)	Appearance of Defendants
Hall et al)	Request for Bail
Defendants.)	
)	

Whereas: U.S. District Court, District of South Carolina (Greenville), Case #: 6:13-cr-00170-CRI, Case Title: USA v. Hall et al, hereinafter this “Case”, is a derivative of a Civil Action No. 8:12-cv-2078-JMC IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA, ANDERSON/GREENWOOD DIVISION, hereinafter the “Civil Case”, wherein the RECEIVER FOR RONNIE GENE WILSON AND ATLANTIC BULLION & COIN, INC., **PETITIONED FOR A RULE TO SHOW CAUSE** why Property in the hands of the Benton T. Hall and Gordon L. Hall as “Accommodation Parties” for BENTON T. HALL and GORDON L. HALL, hereinafter “Defendants”, named in the Case should not return named Property in the Civil Case back to the RECEIVER and the UNITED STATES in the Civil Case as Property rightfully belonging to the Receivership. The Defendants in the Case were respondents in the Civil Case in both their individual capacity and their capacity as trustees of Roylin Trust, which held the Property described in the Civil Case; and,

Whereas: The Accommodation Parties in This Civil Case for the Respondents in the Civil Case timely responded privately to the RECEIVER and agreed to return the cash value of the Property requested in the Civil Case in lieu of the return of the actual Property; and,

Whereas: The RECEIVER did not voice any objection to the counter-offer of the Accommodation Parties; and,

Whereas: The Accommodation Parties are currently in the process of executing this counter-offer and memorializing this in a Private Administrative Process the completion of which will be a RECORD sustainable as admissible evidence that the RECEIVER and the United States has been made whole in the RECEIVER’s request; and,

Whereas: Neither the Accommodation Parties in the Civil Case and the Accommodation Parties for the Defendants nor the Defendants in the Case have ever entered into any acts or actions to knowingly or willfully or corruptly combine, conspire, confederate, agree and have a tacit understanding with others, and particularly with Wallace Lindsey Howell, to corruptly influence, obstruct and impede the due administration of justice in the investigation and prosecution of In re Receiver for Ronnie Gene Wilson, et al., No.8: 12-2078 by any means unless one presumes that the offer to return the property requested by the RECEIVER is an act or action to deliberately commit the above offenses; and,

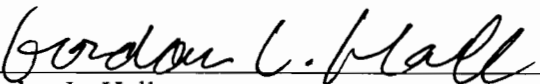
Whereas: The Accommodation Parties at no time have knowingly or willfully committed any acts or actions to receive any Property described in the Civil Case or the Case from Wallace Lindsey Howell or from any other person associated with Wallace Lindsey Howell or Ronnie Gene Wilson or Atlantic Bullion & Coin, Inc., at any time in which the Property was known to have been Property in which the RECEIVER in In re Receiver for Ronnie Gene Wilson, et al., No.8: 12-2078, had an interest for the return thereof; and,

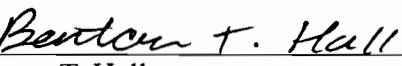
Now Therefore: It is and has been the intent of the Accommodation Parties and the Defendants to cooperate with the Civil Case and the Case courts to resolve these issues and charges in favor of the RECEIVER and the United States, and the Defendants do hereby request that this honorable Court grant reasonable bail and release pending the outcome of these proceedings so that the Defendants may assist in the resolution of these matters in compliance with law and justice.

The Defendants are not a danger to the society since the Defendants are cooperating with these Courts and have done nothing to waste the assets described in the Cases.

The Defendants are also not a flight risk. Defendants have a solid family base in Phoenix, Arizona, and are upstanding members of the community.


Respectfully submitted,


Gordon L. Hall


Benton T. Hall

PROOF OF SERVICE

On this 10 day of April, 2013, a true and correct copy of the above entitled APPEARANCE OF DEFENDANTS, REQUEST FOR BAIL, was served upon William J. Watkins, Jr., US Attorney for Plaintiff UNITED STATES OF AMERICA by placing a copy in a sealed envelope and depositing said envelope in the United States Postal Service mail with postage prepaid addressed to: William J. Watkins, Jr., US Attorney's Office, 55 Beattie Place, Suite 700, Greenville, SC 29601.

A handwritten signature in black ink, appearing to read "Watkins, Jr.", is written over a horizontal line.